

# EXHIBIT C

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NIKE, INC., :  
Plaintiff, : Case No. 22-cv-983  
:  
v. :  
STOCKX LLC, :  
Defendant. :  
----- :

VIDEOTAPE DEPOSITION OF:  
BARBARA DELLI CARPINI  
NEW YORK, NEW YORK  
TUESDAY, JANUARY 10, 2023

REPORTED BY:  
SILVIA P. WAGE, CCR, CRR, RPR  
JOB NO. 5593380

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January 10, 2023

9:41 a.m.

Videotape deposition of BARBARA DELLI  
CARPINI, held at the offices of DEBEVOISE &  
PLIMPTON LLP, 919 Third Avenue, New York, New  
York, pursuant to agreement before SILVIA P.  
WAGE, a Certified Shorthand Reporter, Certified  
Realtime Reporter, Registered Professional  
Reporter, and Notary Public for the States of New  
Jersey, New York and Pennsylvania.

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VIDEOGRAPHER

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2 counterfeits on StockX's website?

3 MS. DUVDEVANI: Objection.

4 A. Nike is always harmed by the sale of  
5 counterfeit products.

6 Q. Can you give me anymore detail?

7 MS. DUVDEVANI: Objection.

8 A. I believe I've answered to this  
9 question already several times. So Nike gets  
10 harmed by counterfeit being sold in the  
11 marketplace because consumers would believe that  
12 those are genuine while they could be harming  
13 consumers along with taking away sales from Nike  
14 as well.

15 Q. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 MS. DUVDEVANI: Objection.

20 A. [REDACTED]

21 Q. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 MS. DUVDEVANI: Objection.

25 A. [REDACTED]

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2 [REDACTED]

3 Q. What do you mean by that? How would  
4 you quantify it?

5 A. Based on the number that is sold you  
6 will quantify how much damage has been done to  
7 Nike.

8 Q. So do you have a figure --

9 A. On top of the financial and the image  
10 damage to the brand, reputation damage as well  
11 will add up, in my view.

12 Q. Okay. So -- but what I want to try  
13 to understand right now is the financial damage.

14 Was there any financial damage to  
15 Nike from the sale of these alleged counterfeit  
16 shoes on StockX's website?

17 MS. DUVDEVANI: Objection.

18 A. I guess that that needs to be  
19 quantified, as I said before. So there is always  
20 a damage to Nike financial and of brand  
21 reputation where a counterfeit is sold.

22 Q. Do you have any specific --

23 A. I don't.

24 Q. -- any other specific details?

25 What is the alleged harm to Nike from

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1 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL EYES ONLY  
2 counterfeit Nike product underperforming, as I  
3 said before, will not buy Nike products again.

4 Q. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 A. [REDACTED]

8 [REDACTED]

9 Q. Who are Nike's core competitors in  
10 footwear?

11 A. Adidas, Pumas Under Armour --  
12 (Stenographer clarification.)

13 A. Adidas, Puma, Under Armour, a number  
14 of sporting good companies out there are Nike  
15 competitor, main Nike competitor.

16 Q. [REDACTED]

17 [REDACTED]

18 MS. DUVDEVANI: [REDACTED]

19 A. [REDACTED]

20 Q. [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. [REDACTED]

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2 A. Those are the ones that come to my  
3 mind.

4 Q. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 MS. DUVDEVANI: [REDACTED]

8 A. [REDACTED]

9 [REDACTED]

10 Q. [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 A. [REDACTED]

14 Q. [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 A. [REDACTED]

19 Q. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 A. [REDACTED]

24 Q. Does Nike struggle to sell out  
25 limited release products because of StockX's